

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM  
POWER PRODUCTS MARKETING, SALES  
PRACTICES, AND PRODUCTS LIABILITY  
LITIGATION

No. 3:16-md-02738-MAS-  
RLS

*Bondurant v. Johnson & Johnson*, No. 3:19-cv-14366  
*Converse v. Johnson & Johnson*, No. 3:18-cv-17586  
*Gallardo v. Johnson & Johnson*, No. 3:18-cv-10840  
*Judkins v. Johnson & Johnson*, No. 3:19-cv-12430  
*Newsome v. Johnson & Johnson*, No. 3:18-cv-17146  
*Rausa v. Johnson & Johnson*, No. 3:20-cv-02947

**DECLARATION OF JESSICA DAVIDSON IN SUPPORT OF  
DEFENDANTS JOHNSON & JOHNSON AND LLT MANAGEMENT, LLC  
(N/K/A RED RIVER TALC LLC)’S (1) REPLY IN SUPPORT OF THEIR  
MOTION FOR SUMMARY JUDGMENT, (2) REPLY TO PLAINTIFFS’  
RESPONSIVE STATEMENT OF MATERIAL FACTS IN OPPOSITION TO  
DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT AND (3)  
RESPONSE TO PLAINTIFFS’ SUPPLEMENTAL STATEMENT OF  
DISPUTED MATERIAL FACTS**

I, Jessica Davidson, declare as follows:

I am an attorney and a partner with the law firm Skadden, Arps, Slate,  
Meagher & Flom LLP, counsel for Defendants Johnson & Johnson and LLT  
Management, LLC (n/k/a Red River Talc LLC) (collectively, “Defendants”)<sup>1</sup> in the

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<sup>1</sup> Due to a corporate restructuring, any talc liabilities formerly held by  
Johnson & Johnson Consumer Inc. were transferred to LTL Management LLC,  
which was subsequently known as LLT Management, LLC. Following a second  
(cont’d)

above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in Support of (1) Defendants' Reply in Support of Their Motion for Summary Judgment, (2) Defendants' Reply to Plaintiffs' Responsive Statement of Material Facts in Opposition to Defendants' Motion for Summary Judgment and (3) Defendants' Response to Plaintiffs' Supplemental Statement of Disputed Material Facts.

1. Attached hereto as **Exhibit 1** is a true and correct copy of relevant excerpts of the transcript of the deposition of Daniel L. Clarke-Pearson, August 27, 2021 (MDL).
2. Attached hereto as **Exhibit 2** is a true and correct copy of relevant excerpts of the transcript of the deposition of Daniel L. Clarke-Pearson, March 8, 2024 (MDL).
3. Attached hereto as **Exhibit 3** is a true and correct copy of relevant excerpts of the transcript of the deposition of Pasqualina Rausa, January 27, 2021 (*Rausa*).
4. Attached hereto as **Exhibit 4** is a true and correct copy of PRAUSAPL-000027.
5. Attached hereto as **Exhibit 5** is a true and correct copy of the Petition in *Swann v. Johnson & Johnson*, No. 1422-CC09326 (Mo. Cir. Ct. filed July 31, 2014).

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and separate restructuring, talc liabilities for ovarian cancer and gynecological cancers are now held by Red River Talc LLC. Additional information concerning Red River can be found at <https://dm.epiq11.com/case/redrivertalc/info>.

6. Attached hereto as **Exhibit 6** is a true and correct copy of Cramer, *The Association Between Talc Use and Ovarian Cancer: A Retrospective Case-Control Study in Two US States*, 27(3) Epidemiology 334 (2016).
7. Attached hereto as **Exhibit 7** is a true and correct copy of relevant excerpts of the transcript of the deposition of Daniel L. Clarke-Pearson, August 26, 2021 (MDL).
8. Attached hereto as **Exhibit 8** is a true and correct copy of CONVERSE\_HILARY\_YALENEWHAVENHOSPITAL\_00346.
9. Attached hereto as **Exhibit 9** is a true and correct copy of Report of Cheryl Saenz Re: Tamara Newsome, May 28, 2024.
10. Attached hereto as **Exhibit 10** is a true and correct copy of NewsomeT-HCHMR-00277.
11. Attached hereto as **Exhibit 11** is a true and correct copy of NewsomeT-HCHMR-00156.
12. Attached hereto as **Exhibit 12** is a true and correct copy of IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, Vol. 93, Carbon Black, Titanium Dioxide, and Talc (2010).
13. Attached hereto as **Exhibit 13** is a true and correct copy of Lynch, *Systematic Review of the Association Between Talc and Female Reproductive Tract Cancers*, 5 Frontiers in Toxicology 1 (2023).

14. Attached hereto as **Exhibit 14** is a true and correct copy of relevant excerpts of the transcript of the deposition of Patricia G. Moorman, February 13, 2024 (MDL).

15. Attached hereto as **Exhibit 15** is a true and correct copy of relevant excerpts of the transcript of the deposition of John Hopkins, November 5, 2018 (MDL).

I certify under penalty of perjury that the foregoing is true and correct.

Dated: October 16, 2024



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Jessica Davidson